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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION**

OREGON WILD HORSE ORGANIZATION, et al.,

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

Case No. 2:24-cv-01673-HL

**JOINT STIPULATION AND NOTICE
OF WITHDRAWAL OF PLAINTIFFS'
MOTION FOR A PRELIMINARY
INJUNCTION**

**JOINT STIPULATION AND NOTICE OF WITHDRAWAL OF PLAINTIFFS' MOTION FOR
A PRELIMINARY INJUNCTION**

Plaintiffs OREGON WILD HORSE ORGANIZATION, CENTRAL OREGON WILD HORSE COALATION, and WESTERN WATERSHEDS PROJECT filed Plaintiffs' Notice of Motion and Motion for a Preliminary Injunction on June 20, 2025, with accompanying declarations and Request for Judicial Notice. ECF 48-54. A hearing on Plaintiffs' Motion for a Preliminary Injunction is set for July 11, 2025. ECF 47.

WHEREAS the parties have since met and conferred regarding Plaintiffs' Motion for a Preliminary Injunction;

WHEREAS Defendants UNITED STATES DEPARTMENT OF INTERIOR, BUREAU OF LAND MANAGEMENT, and BARRY BUSHUE, Oregon State Director of the Bureau of Land Management (hereafter "Federal Defendants") will not conduct the gather operations in the Kiger Herd Management Area currently scheduled to begin on July 21, 2025, and Federal Defendants will not conduct the gather operations in the Riddle Mountain Herd Management Area currently scheduled to begin on August 7, 2025, as laid out in the Declaration of Donald Rotell, *see* Attachment A, Declaration of Donald Rotell;

WHEREAS Federal Defendants will not conduct additional population management gather operations in the Riddle Mountain Herd Management Area or in the in the Kiger Mountain Herd Management Area pursuant to the Kiger and Riddle Mountain Herd Management Areas Wild Horse Population Management Plan at issue in this case until the Court either issues a ruling on the merits in the above-captioned case or until July 2026, whichever comes first, *see id.*;

NOW, THEREFORE, the Parties agree that the Court need not address Plaintiffs' Motion for a Preliminary Injunction.

By this notice, Plaintiffs do not waive their right to file another motion for preliminary injunction in the future should BLM's actions warrant.

JOINT STIPULATION AND NOTICE OF WITHDRAWAL OF PLAINTIFFS' MOTION FOR
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Plaintiffs therefore withdraw Plaintiffs' Motion for a Preliminary Injunction and request this Court remove from calendar the hearing currently set for July 11, 2025, without prejudice.

Dated: June 30, 2025

Respectfully submitted,

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/s/ Jacob Jose

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